

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the

District of _____

Division _____

Case No. 2:22-cv-01233-BNW

(to be filled in by the Clerk's Office)

RODNEY LASHAIN WASHINGTON

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Jury Trial: (check one) ☒ Yes ☐ NoT-MOBILE

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

RODNEY L. WASHINGTON #516
 2795 DESERT FOOTHILLS BLVD
 BULLHEAD CITY (MOHAVE COUNTY)
 ARIZONA 86429
 714-280-2351
 themythreal@gmail.com
 themythreal@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question ☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* _____, is a citizen of the State of *(name)* _____.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* _____, is a citizen of the State of *(name)* _____. Or is a citizen of *(foreign nation)* _____.

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Defendant No. 1

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

T-MOBILE
RICHARD JOHNSON, OWNER
3618 FACTORIA BLVD SE
BELLEVUE (KING)
WASHINGTON 98006
800-937-8997
support@tmobile.com

Defendant No. 2

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

Defendant No. 3

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

Defendant No. 4

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

b. If the defendant is a corporation

The defendant, (name) T-MOBILE, is incorporated under the laws of the State of (name) WASHINGTON, and has its principal place of business in the State of (name) WASHINGTON.
 Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

\$50,000

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Breach of Contract, Damages, Related

Defendant willfully misled customers, facilitated an electronic environment... (SEE ATTACHED STATEMENT OF CLAIM)

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

SEE ATTACHED (RELIEF)

III.: Statement of Claim

①

T-Mobile broke all contractual obligations by willfully engaging in deceptive business practices causing great pain, stress and physical and emotional damage indescribable. Said defendants willfully did not disclose to customers the separation of services within their company structure that led to constant phone disruptions during calls, missed calls, inability to use phone for its intended use. Caused me personally to not be able to communicate properly with my children, mother, friends.

(2)

Caused calls to not come through from doctors and medical personnel causing me to miss doctor appointments, get vital medical information and direction. Aggravated to the maximum my Bipolar condition. Blocked me from getting relief for my extremely painful physical condition.

Furthermore caused great aggravation with countless visits to T-Mobile store to no avail of any fix. A T-Mobile representative ineptly caused an environment electronically

rendering me, for zero good cause, to become ineligible within their system to be eligible to receive any new phone for relief. I Mobile had no remorse, no apologies and even went further in making it extremely difficult to communicate with said company effectively going as far as using an electronic bot for the purpose of reducing if not all but eliminating any chance to effectively receive assistance, which was its obvious purpose.

④

In evidence it will be proven that not only did T-Mobile willfully engage in spotty service but monthly collected bill payments for service not received. It will be proven just on punitive damages alone that T-Mobile caused unlimited, irreparable damages to the Plaintiff having no remorse or desire to make it right. T-Mobile is and has engaged willfully in unethical business practices strictly for the purpose of financial gain.

T-Mobile constantly falsely led myself and other customers to believe they would fix problems as they arrived, but again, it was just rehearsed responses to keep our services and payments coming. The biggest representative of that is when the LGE crashed causing millions of customers like myself total inability to use any aspect of my phone. No warning despite T-Mobile's inside knowledge of

⑥

The very likely possibility that this may happen. Instead of being honest, they perpetrated a fraud and cover up. Even going as far as to encourage and advised us to factory ~~reset~~ our ~~phones~~ at their direction stating it would fix the problem.

Factory resetting a phone wipes out all data, videos, pictures, music masters, in my case, everything. Feeling desperate after

(7)

hanging on and suffering from the stress of the last year up to that point and needing my phone due to extreme health issues.

I had been an easy target being physically and mentally weak for the last two years. In and out of the hospital. Even informing them of that through frustrating customer service calls. Constant visits to the T-Mobile store.

(8)

They constantly chose to abuse and take advantage of my weak state with a phone that most of the time didn't work properly, the subsequently didn't work at all due to the LGE crash.

You will see text request for us to still pay our bill despite the grief they had caused. I'm excited to finally tell the world what kind of company they are.

⑨

Tell the world in and through
actual conversations that they
DO NOT care if you're sick,
disabled, veteran, elderly, in
a weakened state, those affected
by Covid, those incapacitated,
~~whatever~~ whatever life issue we have
and may face they made it clear.
They DO NOT CARE.

On actual dollar amount

(10)

It calculated in pain and suffering, deceit, rehearsed customer service to ignore issues, in store claims to be helpless for the only product they sell. That is the Real T-Mobile and now the world gets to know.

Thank you,

Rodney Lashain
Washington

Relief

The plaintiff is due relief for minimum of eighteen months of service paid refund due to constant interrupted service as well as consistent non service. Said defendant engaged in deceptive practice towards the plaintiff causing undue physical and mental stress. Caused disabled plaintiff in constant need of medical care to miss appointments, medical phone calls from doctors, nursing staff

as well as delayed pharmaceuticals, medications. Broken and dropped calls for a minimum of eighteen months causing the inability to effectively communicate with my mother and children. Effectively caused harm in trying to date and pursue romantic opportunities. I-Mobile caused through direct error by I-Mobile personnel blocking me from being able to upgrade to a new and better phone before the ultimate crash of the

entire system where I was ⁽³⁾ unable to use the phone in any capacity.

The amount of \$50,000 requested is only a fraction of what is truly due to the plaintiff as the sheer overwhelming uncaring attitude towards plaintiff throughout was unacceptable and designed to make it difficult if not impossible to effectively communicate issues. And even once expressed, all issues were met with rehearsed

lines instead of any human ④
compassion. Then as usual I
was sent a monthly bill for my
aggravation.

Furthermore, after nearly
ten to twelve visits to the T-Mobile
store seeking relief and/or assistance
and greeted with "can't help you",
the strain of said numerous trips
eventually caused my vehicle to
break down on the way home from
my last visit. I live in a place

⑤

where without proper transportation, life is all but unbearable

Plaintiff,

Rodney L.

Hastington

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 7/29/22Signature of Plaintiff Rodney L. WashingtonPrinted Name of Plaintiff RODNEY L. WASHINGTON**B. For Attorneys**

Date of signing: _____

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

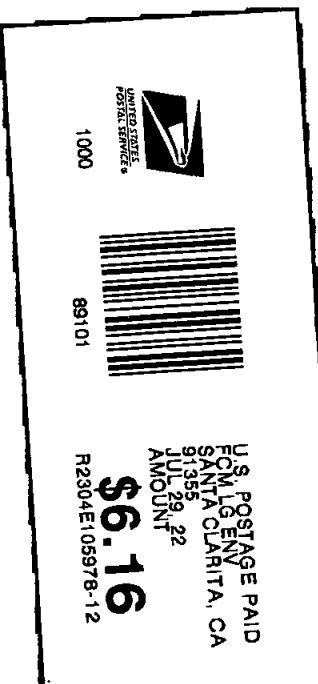
Street Address _____

State and Zip Code _____

Telephone Number _____

E-mail Address _____

Ordway Washington
2795 Desert Inn Blvd.
Suite #516
Boulder City, NV 86409



U.S. District Court Office
of the Clerk
333 Las Vegas, South, Room 13
Las Vegas, NV 89101

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